

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
JAMES GILLIS, )  
)  
Defendant. )

CRIMINAL NO. 17-cr-30198-MJR

**STIPULATION OF FACTS**

The attorney for the United States and the attorney for the Defendant have engaged in discussions and have stipulated to the following facts to support the plea of guilty in accordance with U.S.S.G. § 6B1.4.

1. The Defendant's actions as charged in the Indictment occurred within the Southern District of Illinois.

2. James Gillis was the Chief of Project Management for the 375<sup>th</sup> Civil Engineering Squadron (375 CES) at Scott Air Force Base, located in Saint Clair County, Illinois.

3. The squadron, 375 CES, set the requirements for and obtained the estimated programmed dollar amount, or programmed amount (PA), for various projects under the Multiple Award Construction Contract (MACC).

4. The PA for each project is confidential source selection information because the maximum award for architecture and design work is six percent (6%) of the PA on each project.

5. Most PAs were in amounts less than \$2 million.

6. Gillis shared this confidential PA with various potential contractors on various individual projects.

7. Some of these contractors submitted bids at 5.99 percent or even 6.0 percent of the PA. Gillis has admitted his role.


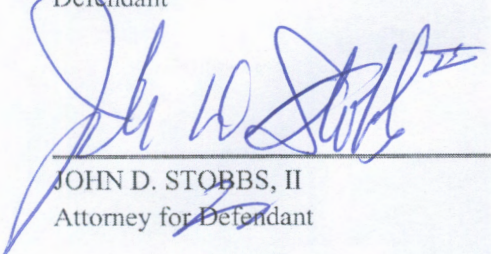
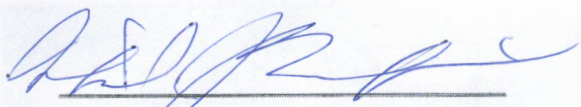
8. The date of offense in the charging information (April 18, 2106) is based upon an email by which Gillis re-sent information to a potential bidder.

9. Gillis received lunch and baseballs ticket in connection with providing the confidential source information.

**IT IS SO STIPULATED.**

UNITED STATES OF AMERICA,

DONALD S. BOYCE  
United States Attorney

  
\_\_\_\_\_  
JAMES GILLIS  
Defendant  
\_\_\_\_\_  
JOHN D. STOBBS, II  
Attorney for Defendant  
\_\_\_\_\_  
MICHAEL J. QUINLEY  
Assistant United States Attorney

Dated: 12-6-17, 2017

Dated: 12-7-2017, 2017